

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LOUIS E. GULLEY,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 17 CV 08209
	)	
DR. JONATHAN KELLY,	)	Honorable Judge Edmond E. Chang
	)	
Defendants	)	Honorable Judge Daniel G. Martin
	)	
	)	

**DEFENDANT DR. JONATHAN KELLY’S MOTION TO DISMISS PLAINTIFF’S  
COMPLAINT**

NOW COME Defendant, DR. JONATHAN KELLY, by and through his attorneys, BOLLINGER CONNOLLY KRAUSE, LLC, and, pursuant to Federal Rule 12(b)(6), hereby moves to dismiss Plaintiff’s Complaint (Dkt. 10) for failure to state a claim upon which relief may be granted as fully set forth in the Memorandum of Law in Support of Defendant’s Motion to Dismiss, filed concurrently and incorporated herein by reference.

WHEREFORE Defendant, DR. JONATHAN KELLY, respectfully requests this Honorable Court grant his Motion to Dismiss Plaintiff’s Complaint with Prejudice (Dkt. #10) and for such other relief the Court deems just and appropriate including costs.

Respectfully Submitted,

DR. JONATHAN KELLY

By: /s/ Christopher Miller  
*One of the Attorneys for Defendants*

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2018, I caused the foregoing document to be filed electronically with the Clerk of the Court through ECF and a copy of the foregoing document was sent via U.S. Mail to the following party:

**Pro Se Plaintiff**

Louis E. Gulley  
Inmate #B18477  
Stateville Correctional Center  
P.O. Box 112  
Joliet, IL 60434

I hereby certify that on March 20, 2018, I caused the foregoing document to be filed electronically with the Clerk of the Court through ECF and to be served upon all counsel of record by filing the same with the CM/ECF system.

Illinois Department of Correction  
100 W. Randolph Street  
Suite 4-200  
Chicago, IL 60601  
[Doc.ilndnotices@illinois.gov](mailto:Doc.ilndnotices@illinois.gov)

By: /s/ Christopher M. Miller